

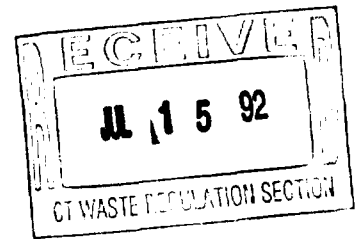


**UNITED
TECHNOLOGIES
PRATT & WHITNEY**

July 10, 1992

RCRA RECORDS CENTER
FACILITY Pratt & Whitney Main St
I.D. NO. CTD990672081
FILE LOC. B-1B
OTHER RDMS #2320

400 Main Street
East Hartford, Connecticut 06108



Mr. David A. Nash, Director
Connecticut Department of Environmental Protection
Waste Engineering and Enforcement Division
165 Capitol Avenue
Hartford, CT 06106

Ref: Pratt & Whitney RCRA Part B Permit Application EPA ID. No.
CTD990672081.

Dear Mr. Nash:

In response to the June 26, 1992 request for additional information in reference to the subject permit application, Pratt & Whitney is pleased to submit an item by item summary addressing each request.

NOTE: DEP COMMENTS ARE PARAPHRASED IN BOLD TYPE FOLLOWED BY P&W'S RESPONSE.

1. Provide a detailed certification report by a registered Professional Fire Protection Engineer of compliance with NFPA 30, 43A and 43B standards for those wastes and other materials to be stored within the Centralized Waste Storage and Transfer Facility (CWS&TF). The report must specifically identify all applicable NFPA Class IA, IB, IC, II, IIIA and IIIB flammable materials; Class 1, 2, 3 and 4 oxidizers; and Class I, II, III, and IV organic peroxides and demonstrate how such standards have been met or do not apply. The detailed certification should be based on the final plans and specifications. Please specify if any deviations of final plans and specifications have been made. If so, please recertify compliance with the above stated NFPA standards.

As discussed with the DEP, P&W respectfully requests a submittal date of 7/24 in order to provide a complete and adequate response to this request.

2. Provide a copy of the Internal Waste Manifest Form and a representative printout for the Industrial Waste Tracking System (IWTs).

As you are aware, Pratt & Whitney utilizes a sophisticated computer controlled Industrial Waste Tracking System. This system utilizes an Internal Waste Manifest Form for proper internal tracking purposes. However, as in all systems, improvements and upgrade refinements often lead to clerical or format revisions. P&W recognizes the need for future system modifications which could result in a necessary change to the forms generated on IWTs. Although any changes to IWTs forms would meet or exceed any minimum data requirements, the format may be subject to revision.

Ultimately P&W's concern with providing an actual copy of the Internal Waste Manifest Form and representative printout of the IWTS information screen is incorporation of a single format into the Part B permit. However, based on recent phone conversations between P&W and DEP the submittal of this requested information is for viewing purposes only and the permit will not address the form, only the minimum requirements a form must contain. Therefore, with this assurance in mind, P&W is pleased to submit a representative copy of each requested form for the DEP's viewing purposes.

3. Provide information regarding the requirements applicable to the handling of materials with a Health Hazard degree of 3. This information should include, at a minimum, assessment of the actual hazard associated with the hazardous waste or other material, determination and use of the appropriate Personnel Protective Equipment (PPE), and sampling procedures.

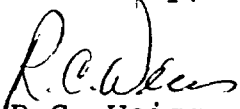
P&W would like to respond to this request by referencing the draft Part B permit Sections IV A.3.1) and IV A.3.2). In reference to Section IV A.3.1), which specifies the handling and management requirements of waste or other materials with NFPA Health Hazard Ratings of 3 or greater, P&W submits the following:

Actual hazard assessment is accomplished through the use of the requirements as defined in the Waste Analysis Plan. This assessment will result in the assignment of the appropriate NFPA Health Hazard Rating. Material which exhibits a Health Hazard Rating of 3 or higher shall be distinguished from other material through a labelling system, either manual or computer generated. Employees in the immediate vicinity engaged in real time handling of open containers and tanks (i.e. container sampling) shall utilize respirator protection, maintain visual or verbal contact with another employee, and wear appropriate personal protective equipment.

P&W understands that Section IV A.3.2) which delineates conditions for the handling of materials with Health Hazard Ratings of 3 or greater in closed containers or tanks is not required, as the storage restrictions specified elsewhere in the permit adequately address these materials as well.

Thank you for your cooperation. If you have any questions concerning this submittal please call Paul Guilmette at 557-0900.

Sincerely,



R.C. Weiss
Director, Facilities & Services
RCW/PGG

cc: T. Keeney, Commissioner CT DEP
R. Barlow, Chief Bureau of Waste Management
G. Dews, Waste Engineering and Enforcement
L. Clune, Waste Engineering and Enforcement Engineer
J. Podgurski, U.S. Environmental Protection Agency

* INDUSTRIAL WASTE MANIFEST ISSUE *

ACTION _ PLANT CODE => _
 PWA MANIFEST => _ SUFFIX => _ LAST ACT => _
 ISSUANCE PLANT CODE => _ SUPV CODE => _
 INFO: DEPARTMENT => _ MAIL STOP => _
 SUPERVISOR => _ PHONE => (_) _
 ISSUE DATE => _
 ACCUMULATION AREA => _
 CONTAINER QTY => _
 CONTAINER TYPE => _
 ITEM ITEM IDENT => _ TO BE RECYCLED (Y/N) => _
 INFO: PMC/PWA/PS => _
 GENERIC NAME => _
 CATEGORY => _
 HANDLING LABELING INFO => _
 INFO: UN/NA # => _ WASTE STATE => _
 EPA NUMBERS => _
 PROPER SHIPPING NAME => _

COMMENTS => _ SAMPLE NO => _
 PRINTERS: MANIFEST => _ LABEL => _ WORKSHEET(Y/N) => _
 PF1-STOR PF2-CLR PRNT: PF3-MANIF PF4-LABEL PF5-BOTH PF10-SUPP PF11-SYS PF12-HELP
 *** PLEASE ENTER VALID ACTION PLANT AND MANIFEST LVL

* INDUSTRIAL WASTE MANIFEST STORAGE *

ACTION: I PLANT CODE => _
 PWA MANIFEST => _ * SUFFIX => _
 FULL DATE => _
 RECEIVED INFO: RECVD DATE => _ SHIFT => _
 NET WEIGHT => _
 STORAGE LOC => _
 CONTAINER QTY => _ EMPTY QTY => _
 IN STORAGE: NET WEIGHT => _ >90DAY WT => _
 CONTAINER QTY => _ SPLIT FLAG(Y/N) => _
 SAMPLE NO => _

COMMENTS: _
 PF1-MANIF ISSUE PF3-SHIP ORDER PF4-TREAT BATCH PF5-TRANS ORDER
 PF6-TRANS RECPT PF7-MVE/SPT/RPK PF10-SUPP MENU PF11-SYS MENU PF12 HELP
 *** REJECT MANIFEST NUMBER MUST NOT BE BLANK LVL 018



INTERNAL WASTE MANIFEST

MANIFEST NO: 425610

GENERATING DEPT	PLANT	SUPERVISOR	MAIL STOP	PHONE NUMBER	DATE
GENERIC DESCRIPTION			GENERATING PROCESS		
ITEM IDENTIFICATION CODE		CATEGORY	ACCUMULATION AREA		
CONTAINER ISSUE DATE		FULL DATE	ACCUMULATION START DATE		
# OF CONTAINERS ISSUED		# OF CONTAINERS RETURNED		CONTAINER TYPE	
		FULL: EMPTY:			
ADDITIONAL COMMENTS					
WASTE INSPECTOR		DATE AND SHIFT ACCEPTED		RECEIVED AT	
STORAGE LOCATION		FACILITY INFORMATION		CWTP INFORMATION	
TRANSFER NUMBER					
SAMPLE NUMBER		LBS GROSS		LBS GROSS	
WASTE REJECTION		LBS TARE		LBS TARE	
REASON:		LBS NET		LBS NET	
				STOR LOC CODE	INITS.

